

The Honorable Robert J. Bryan

**UNITED STATES DISTRICT COURT WESTERN DISTRICT OF  
WASHINGTON AT TACOMA**

STEVEN L. KLINGER, JR., and SHEILA J. KLINGER,

Plaintiffs,

v.

WELLS FARGO BANK, N.A.; NORTHWEST TRUSTEE SERVICES, INC.,

Defendants.

No. 3:10-cv-05546-RJB

**DECLARATION OF JENNIFER  
ROBINSON IN SUPPORT OF  
DEFENDANT WELLS FARGO'S  
MOTION FOR SUMMARY  
JUDGMENT**

**NOTED ON MOTION CALENDAR:  
November 5, 2010**

I, Jennifer Robinson declares and says;

1. I am Default Litigation of defendant Wells Fargo Home Mortgage ("Wells"). I am a citizen of the United States, I am over the age of 18, I am competent to make this declaration, and I do so on the basis of personal knowledge and on the basis of records regularly kept in the course of business.

2. Prior to the August 6, 2010, trustee's sale, Wells Fargo was the holder of the promissory note evidencing Plaintiffs' loan of \$243,676.00 secured by a Deed of Trust granted to Mortgage Electronic Registrations Systems, Inc. ("MERS") as nominee for Lender Pierce Commercial Bank, its successors and assigns ("Lender") and recorded April 30, 2008, under Pierce County Auditor's File No. 200804301157.

1 3. Attached to Wells Fargo's Motion for Summary Judgment ("Wells Fargo's  
2 Motion"), as Exhibits 2 and 3, are true and correct copies of the subject Note and Deed of Trust.

3 4. Plaintiffs defaulted under the terms of the Note and Deed of Trust by failing to make  
4 the payment due on August 1, 2009, and every payment due thereafter.

5 5. On or about December 8, 2009, pursuant to Plaintiffs' default and the terms of the  
6 Note and Deed of Trust, Wells Fargo instructed Northwest Trustee Services, Inc. to transmit a  
7 Notice of Default on behalf of Wells Fargo and to foreclose in the name of Wells Fargo Bank, N.A.

8 6. On or about August 6, 2010, Wells Fargo, as highest bidder, was the purchaser of  
9 the property at a valid trustee's sale.

10 7. Attached to Wells Fargo's Motion, as Exhibit 1, is a true and correct copy of the  
11 recorded Trustee's Deed.

12 I declare under penalty of perjury and the laws of the State of Washington that the  
13 foregoing is true and correct to the best of my knowledge.

14  
15 SIGNED this 7<sup>th</sup> day of October, 2010 at Frederick Maryland

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17  
18 Jennifer Robinson  
19 Default Litigation Specialist  
20 Wells Fargo Bank N.A.  
21 successor by merger to  
22 Wells Fargo Home Mortgage Inc.  
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